

ORIGINAL

In the Matter of

CC Docket No. 93-55

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MAY 26 1993

FEDERAL BUREAU OF INVESTIGATION
U. S. DEPARTMENT OF JUSTICE

The Commission offered carriers three options for converting their published tariffs to metric units of measurement. (Notice ¶

unit and rate. The third option would require a carrier to provide in its tariff a conversion table for converting non-metric units and corresponding rates into metric units and rates; the resulting metric units and rates must be clearly shown in the tariff publication and in all supporting information filed with the Commission.

The Commission has asked whether it would better serve the public interest to allow carriers to select from among the proposed options, or to require all carriers to adhere to one method of conversion (Notice ¶ 9). MCI believes the public would be better served by allowing carriers to select from among the three options how they will meet the requirement of incorporating metric units into their tariffs. However, in the event the Commission chooses to require one method of conversion, MCI supports the first option, which would require carriers to place into the general rules section of their tariffs a table for converting non-metric units and rates to metric units. This option accomplishes the goal of including metric measures in the tariff but minimizes the burden of changing all tariff provisions containing measurements.

MCI also supports adopting the proposal of allowing two years for carriers to bring their tariffs into compliance with the metric-conversion requirement, rather than requiring one special compliance filing. This is especially important if the Commission adopts the three-option method of modification because it would allow carriers to modify their tariffs in the general course of tariff updates. This is desirable since it would alleviate the

burden on carriers and customers created by the conversion requirement, without sacrificing the goal of encouraging metric conversion.


CONCLUSION

Therefore, MCI respectfully requests that the Commission adopt the three options for converting to metric units of measure in their published tariffs. If only one option is selected, MCI requests that the Commission adopt the option which would allow carriers to incorporate a metric conversion table in the general rules section of their tariffs. MCI further urges the Commission to adopt its proposal of allowing carriers two years to comply with the metric conversion obligation.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

By:

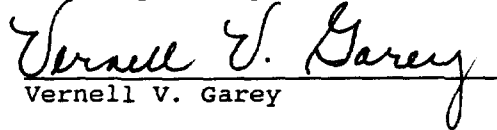

Loretta J. Garcia
Donald J. Elardo
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20006
(202) 887-2082

Its Attorneys

Dated: May 26, 1993

CERTIFICATE OF SERVICE

I, Vernell V. Garey, do hereby certify that copies of the foregoing "Comments" in CC Docket No. 93-55 were served by first-class U.S. mail, postage prepaid, to the following on this 26th day of May, 1993.


Vernell V. Garey

Kathleen Levitz, Acting Chief*
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

James Quello, Acting Chairman*
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554

Gregory J. Vogt, Chief*
Tariff Division, Common Carrier
Bureau
Federal Communications Commission
1919 M Street, N.W., Room 518
Washington, D.C. 20554

Judy Nitsche*
Tariff Division, Common Carrier
Bureau
Federal Communications Commission
1919 M Street, N.W., Room 518
Washington, D.C. 20554

Colleen Boothby*
Mary Brown
Tariff Division, Common Carrier
Bureau
Federal Communications Commission
1919 M Street, N.W., Room 518
Washington, D.C. 20554

International Transcription Service*
1919 M Street, N.W., Room 246
Washington, D.C. 20554

Francine J. Berry
American Telephone and Telegraph
Company
Room 3244J1
295 North Maple Avenue
Basking Ridge, NJ 07920

M.F. DelCasino
Administrator - Rates & Tariffs
American Telephone & Telegraph
Company
Room 32D66
55 Corporate Drive
Bridgewater, NJ 08807

*Hand Delivered